



# KANSAS

RODERICK L. BREMBY, SECRETARY

DEPARTMENT OF HEALTH AND ENVIRONMENT

KATHLEEN SEBELIUS, GOVERNOR

March 7, 2006

Jerome E. Cibrik, P.G.  
Union Carbide Corporation - Remediation Technology Section  
P.O. Box 8361  
3200/3300 Kanawha Turnpike  
South Charleston, WV 25303

423032



RCRA RECORDS

RE: Third Quarter 2005 Status Report, Unison Transformer Services, Inc. Site, Fairfax District, Kansas City, Kansas, Consent Order # 97-E-0036

Dear Mr. Cibrik:

The Kansas Department of Health and Environment (KDHE) has completed review of the above referenced document submitted by Union Carbide Corporation (UCC) for the Unison Transformer Services Site located at 3126 Brinkerhoff Road, Kansas City, Kansas. The status report document was prepared on behalf of UCC by CH2M Hill and was received February 2, 2006. KDHE finds the document acceptable for inclusion into the administrative file. However, KDHE does have the following technical review comments.

1. Please explain the significance of continued pressure in SV-PZ-05 (e.g. effects on contaminant nature and extent) and what Unison intends to do to mitigate this recurring problem.
2. While it is apparent that ground water contaminant concentrations have decreased by notable percentages, there still remains contamination significantly above federally established

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DIVISION OF ENVIRONMENT  
Bureau of Environmental Remediation  
CURTIS STATE OFFICE BUILDING, 1000 SW JACKSON ST., STE. 410, TOPEKA, KS 66612-1367  
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maximum contaminant levels (MCLs). For example, Trichloroethene (TCE) is reported in wells MW-06, MW-09 and SV-93 at 1,650, 2,000 and 1,800 micrograms per liter (ug/l) respectively. Some of the highest TCE contaminated ground water is in the vicinity of an area where UNISON is having significant difficulty maintaining vacuum in the SVE/AS (soil vapor extraction/air sparge) system – specifically SVE well SV-93. This is also true along the southeastern terminus of the property indicating possible continuing contaminant movement offsite.

The same can be noted for vinyl chloride. Vinyl chloride was detected in ground water monitoring wells MW-07 and MW-08 at 31.4 and 31.9 ug/l respectively. These contaminant concentrations are approximately 15 times the MCL.

Please identify the steps UNISON is taking or will take to mitigate this concern and insure control of contaminant migration and that additional impacts to off-site ground water resources are minimized.

3. KDHE agrees that there appears to be evidences that the injection of co-metabolite has resulted in enhanced co-metabolite bioremediation of on-site, volatile-organic based, ground water contamination. Finally, it should also be noted that the ground water contaminant concentrations both on and off site continue to exceed MCLs.

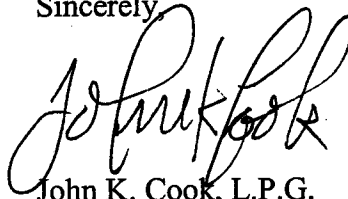
At the very least, Union Carbide must: a) demonstrate that the applied interim remedial alternative has exhausted all potential for continued benefit (i.e. continued reduction of on-site ground water contamination), b) consider and suggest optimization methods to the in place system, c) insure contaminant containment, and d) continue to aggressively pursue completion of the comprehensive investigation/corrective action study off-site characterization and mitigation requirement.

4. In the future, please plot all the wells listed in table 3-5 in appropriate figures (e.g. figure 3-3).
5. For comparison purposes, please include MCLs values in all tables that report ground water contaminant concentrations.

Mr. J. E. Cibrik, P.E.  
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KDHE expects written responses to these technical review comments within 30 days of receipt of this letter. The responses may require submittal of edit copies of the draft report or simply submittal of errata sheets whichever is appropriate. In the meantime, if you have comments or questions I can be reached at [johncook@kdhe.state.ks.us](mailto:johncook@kdhe.state.ks.us) or (785) 296-8986.

Sincerely,

A handwritten signature in black ink, appearing to read "John K. Cook", written over the printed name.

John K. Cook, L.P.G.  
Remedial Section/State Cooperative Unit  
Bureau of Environmental Remediation

JKC/lmb

cc: File: C4-105 70168 1.0  
Michael B. Davis, EPA Region 7, RCAP  
Don Blackert, Key Environmental, Inc.

FORM A-2

STATE OF KANSAS  
**DEPARTMENT OF HEALTH AND ENVIRONMENT**

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